Case: 4:21-cr-00501-JAR-DDN Doc. #: 17 Filed: 09/08/21 Page: 1 of 2 PageID #: 32

SEP - 8 2021

## U. S. DISTRICT COURT EASTERN DISTRICT OF MO ST. LOUIS

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	) ) No.	4:21CR00501 JAR/DD
GREGORY ORTLIP,	)	
Defendant.	)	
	INDICTMENT	
	COUNT I	
The Grand Jury charges that:		

At all times pertinent to the charges in this Indictment:

1.

Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or
  - (v) lascivious exhibition of the genitals or pubic area of any person
  - (18 U.S.C. § 2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

- 2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
- 3. Between on or about August 9, 2021 and August 25, 2021, in St. Louis County, Missouri within the Eastern District of Missouri and elsewhere,

## GREGORY ORTLIP,

the defendant herein, did knowingly solicit, through the mail or using any means or facility of and in and affecting interstate and foreign commerce, by any means, including by computer, any material in a manner that reflected the belief and was intended to cause another to believe that the material solicited contains a visual depiction of a minor engaging in sexually explicit conduct, in violation of 18 United States Code Section 2252A(a)(3)(B)(ii).

SAYLER A. FLEMING United States Attorney

JILLIAN S. ANDERSON, #53918(MO) Assistant United States Attorney